



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*26 Federal Plaza  
38<sup>th</sup> Floor  
New York, New York 10278*

November 15, 2024

**BY ECF & EMAIL**

The Honorable Katherine Polk Failla  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Roman Storm*  
S1 23 Cr. 430 (KPF)**

Dear Judge Failla:

The Government writes respectfully to notify the Court of the filing of a superseding indictment against the defendant, Roman Storm, which was returned today by the grand jury.

This superseding indictment adds no new charges, and differs from the prior indictment against Storm in three principal respects.<sup>1</sup> First, the superseding indictment adds to the charging language in Count One the allegation that the financial transactions at issue involved the movement of funds by wire and other means. The Government sought this change in an abundance of caution to respond to concerns raised by the Court at the September 26, 2024 conference in this matter. *See* Tr. of September 26, 2024 Conference at 26 (noting that “the statute contains additional elements that I don’t believe are clearly alleged, such as the transaction might involve the movement of funds by wire . . . . So if the government is really going that route, they might want to clean up confusion in a superseding charging instrument, if that’s the track they’re pursuing at trial.”).

Second, the superseding indictment changes the date range for the conspiracy charged in Count Two. The original indictment alleged that the conspiracy to operate an unlicensed money transmitting business ran from in or about March 2022 up to and including on or about August 8, 2022. The superseding indictment alleges that this conspiracy ran from in or about February 2022 up to and including on or about August 8, 2022. The superseding indictment also alleges a different

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<sup>1</sup> The superseding indictment also removes the detailed factual allegations in the original indictment and removes Roman Semenov as a defendant, in anticipation of the use of this indictment at the forthcoming trial of Storm.

overt act than the overt act alleged in the original indictment. These changes conform to the evidence the Government has produced in discovery regarding the money transmitting business.

Finally, the superseding indictment lists certain specific properties the Government will seek to forfeit, to provide notice to the defendant.

These modest changes do not affect the factual issues to be presented at trial. There is no additional discovery associated with these changes, and the Government does not anticipate any reason to delay trial in this case, which is currently scheduled to begin on April 14, 2025.

The Government will confer with defense counsel regarding scheduling for an arraignment on the superseding indictment.

Respectfully submitted,

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